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Magalie R. Salas
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

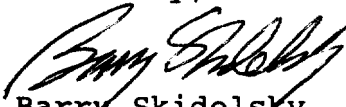
March 5, 1998

Dear Ms. Salas:

Cowboy's Broadcasting LLC ("Cowboy's"), licensee of radio station KVMX (FM) in Eastland, Texas, by counsel, hereby submits the attached Engineering Statement as a supplement to or clarification of its Petition for Rule-Making, as requested by the Commission in the Notice of Proposed Rule Making it released December 12, 1997 (DA 97-2573), in MM Docket No. 97-242.

If there are any problems or questions, please contact me; and, thanks.

Sincerely,



Barry Skidelsky
BdS:hp
att.

cc: C. Boyd/public file
P. Blumenthal (FCC)

ENGINEERING STATEMENT

In Support of a CLARIFICATION OF A PETITION FOR RULE MAKING

**Deleting Channel 236A at Eastland, TX
Allocating Channel 236C3 at Baird, TX
KVMX(FM)
Cowboy Broadcasting, LLC**

The instant statement is prepared for Cowboy Broadcasting, LLC., ("Cowboy") licensee of KVMX(FM) Eastland, Texas, and petitioner for the modification of the KVMX facility to specify channel 236C3 in lieu of its present channel 236A at Eastland. In its Notice of Proposed Rule Making (DA 97-2573), in MM Docket 97-242, the Commission ask for additional data concerning the gain and loss area developed when channel 236A was deleted at Eastland and allotted to Baird as channel 236C3.

METHODS

Additional studies were conducted to determine the remaining services after channel 236A is deleted at Eastland and channel 232C3 is allotted to Baird. To promote clarity with the study, Exhibits D and E from the original petition are included. This demonstrates that a minimum of five signals are included in the loss area. Signal 3 (KEAS-AM) completely encloses the loss area. Signals 4, 5, 6, and 7 completely encompass the loss area and signal 8 intersects the loss area at the overlap point of the allotted channel 236C3 and the existing KVMX 60 dBu. Therefore, signal 8 also extends to completely cover the loss area. The

original study verifies that a minimum of 6 signals remain after channel 236A is deleted at Eastland.

An additional study was conducted to determine the local area facilities which place the required signal strength into or across the loss area. The normal AM .5 mV/m and FM 60 dBu contours were considered. Due to high soil conductivity additional distant AM stations provide signals to the loss area, but they were omitted since the area stations verify far in excess of five remaining services. Exhibit I is a list of area stations included in the Clarification study. Exhibit II is a map with the contours of KVMX and AD 236C3 shown as solid lines. AM .5 mV/m contours are depicted as evenly spaced lines in the contours while FM 60 dBu contours are depicted as uneven spaced lines in the contours. The study computes that at no point in the loss area is there less than eight remaining services.

The study further determines that the gain area has no point in which there is less than 14 signals. This number includes the distant signals depicted in the original petition's Exhibits D and E and signals which penetrate both the gain and loss area.

The original petition included population and area computations which were include in Exhibit C. A copy of that exhibit is included in the instant CLARIFICATION

statement. A summary of the population and area study is as follows;

Community of		Area (Sq KM)		Population (Persons)	
<u>License</u>	<u>Class</u>	<u>Present</u>	<u>Proposed</u>	<u>Present</u>	<u>Proposed</u>
Eastland	A	2,125.6		14,070	
Baird	C3		4,802.9		52,335
Area & Population					
Overlap --			314.6		2,012
loss			<1,811.0>		<12,058>
Net Gain			2,677.3		38,265

CONCLUSION

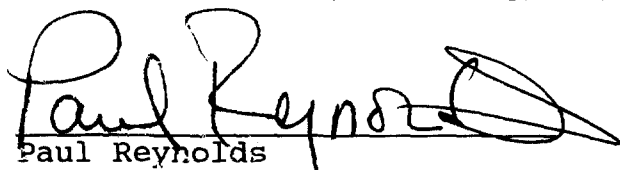
_____The instant extended study is offered to clarify and supplement the data included in the original Cowboy petition for rule making. The results of this study verifies that the petition is in compliance the Commission's MO&O, 5 FCC at 7097. Therefore, the petition can be granted as requested.

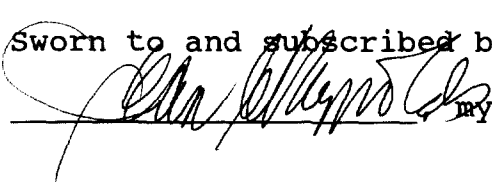
ENGINEERING CERTIFICATION

STATE OF ALABAMA)
)
BUTLER COUNTY)

Paul Reynolds, being first duly sworn upon oath deposes and says:

- * That he has completed undergraduate studies in the field of communications at the University of Southern Mississippi.
- * That he has completed course requirements for a Masters Degree in communications at the University of Alabama.
- * That he completed basic electronics at DeVry Technical Institute.
- * That he has been operating as an independent communications consultant since 1980.
- * That he is familiar with the Commission's Rules and Regulations.
- * That the instant engineering information for the clarification of data in MM Docket 97-242, which seeks an allotment of Ch 236C3 for KVMX at Baird, Texas was prepared by him or under his direct supervision.
- * That all information presented is believed to be true and correct and in full compliance of the technical standards contained in the Commission's Rules and Regulations in affect at the time of the document's filing date.


Paul Reynolds

Sworn to and subscribed before, this 4 day of March, 1998.
 my commission expires 7-15-2000.

ENGINEERING STATEMENT

In support of a

CLARIFICATION OF A PETITION FOR RULE MAKING

Deleting Channel 236A at Eastland, TX
Allocating Channel 236C3 at Baird, TX
KVMX(FM)

Cowboy Broadcasting, LLC

CALL SIGN	CITY OF LICENSE	ERP	ANTENNA (meters/RMS)	SITE COORDINATES	CONTOUR NO.
KSTA	Coleman	.25	152.09	31-51-16 99-25-36	3 <u>1</u>
KJSA	Mineral Wells	.25	150.0	32-47-12 98-05-53	4 <u>1</u>
KSWA	Graham	.50	219.63	33-07-37 98-35-35	5 <u>1</u>
KROO	Brecken- ridge	1.0	313.82	32-45-11 98-55-57	6 <u>1</u>
KSTV	Stephen- ville	.5	223.04	32-12-08 98-14-54	7 <u>1</u>
KCOM	Comanche	.25	144.84	31-53-54 98-35-14	8 <u>1</u>
KEAN	Abilene	.50	217.35	32-26-30 99-43-08	9 <u>1</u>
KBBA	Abilene	5.0	802.48	32-29-26 99-45-02	10 <u>1</u>
KMPC	Abilene	.50	242.39	32-27-21 99-47-59	11 <u>1</u>
KMXO	Merkel	.25	145.65	32-28-17 100-00-19	12 <u>1</u>
KEAN	Abilene	100	247.0	32-16-35 99-35-39	13 <u>2</u>
KORQ	Abilene	100	390.0	32-24-48 100-06-25	14 <u>2</u>
KEYJ	Abilene	100	203	32-17-06 99-38-38	15 <u>2</u>
KHXS	Abilene	4.3	61	32-28-34 99-42-22	16 <u>2</u>

Continued on next page

EXHIBIT I

Continued from previous page

<u>CALL SIGN</u>	<u>CITY OF LICENSE</u>	<u>ERP</u>	<u>ANTENNA (meters/RMS)</u>	<u>SITE COORDINATES</u>	<u>CONTOUR NO.</u>
KROW	Abilene	44	160	32-15-58 99-42-23	17 <u>\2</u>
KCDD	Hamlin	100	300	32-43-31 100-04-19	18 <u>\2</u>
KKHR	Anson	50	89	32-39-47 99-51-13	19 <u>\2</u>
KBCY	Tye	100	227	32-24-39 100-06-26	20 <u>\2</u>
KFQX	Merkel	66	350	32-24-48 100-06-25	21 <u>\2</u>

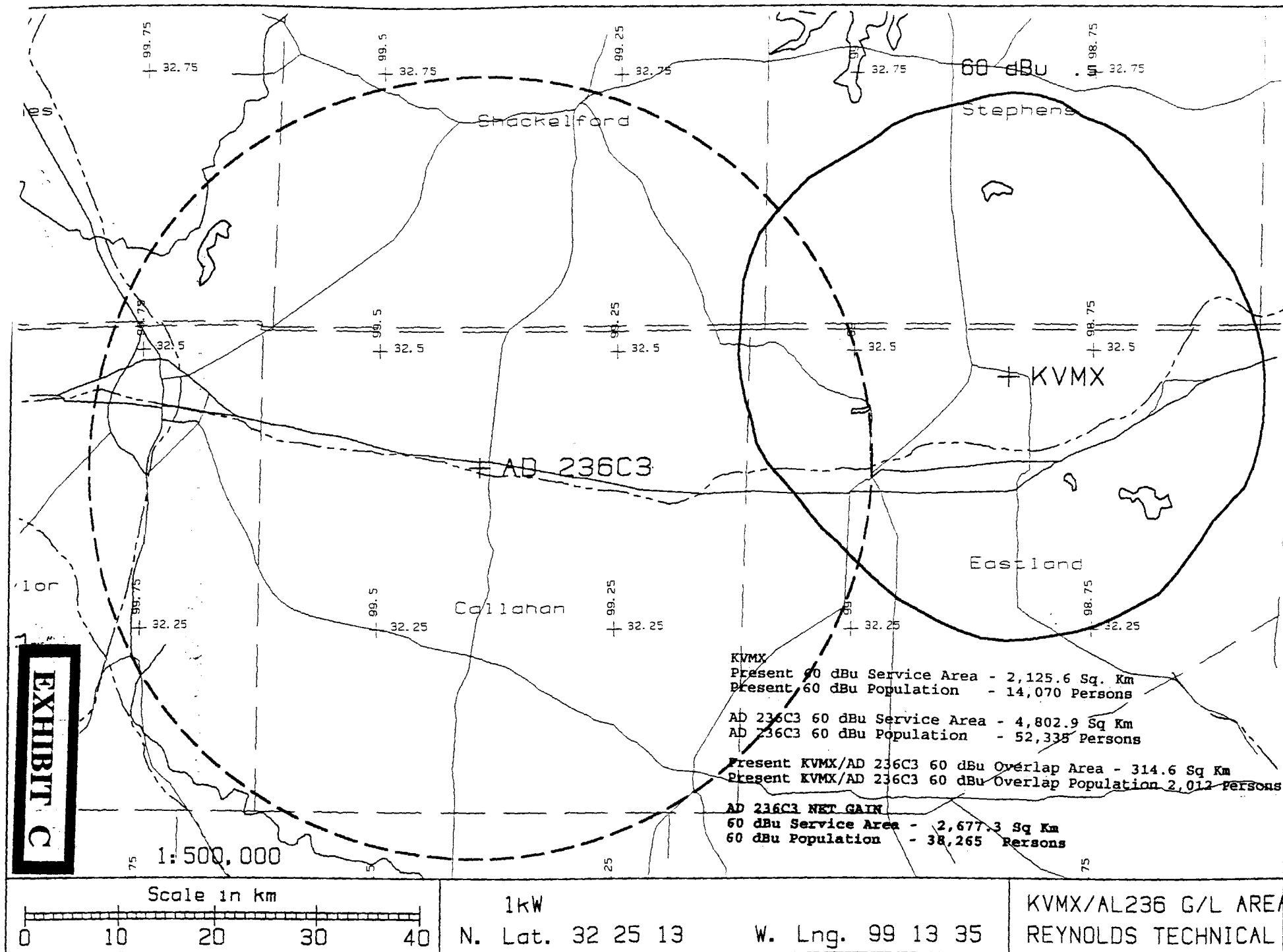
\1 AM Station

\2 FM Station

[illegible]

W. Lng. 98 50 20

KVMX ADDITIONAL STUDIE
REYNOLDS TECHNICAL -



**ENGINEERING STATEMENT
IN SUPPORT OF A**

PETITION FOR RULE MAKING

**Channel 236C3, Baird, Texas
COWBOY BROADCASTING, L.L.C.**

**KVMX.L (Class A) TO AD 236C3
REMAINING SERVICES STUDY**

<u>CALL SIGN</u>	<u>CITY OF LICENSE</u>	<u>ERP</u>	<u>ANTENNA (meters/RMS)</u>	<u>SITE COORDINATES</u>	<u>CONTOUR NO.</u>
KVMX	Eastland	2.850	93.0	32-28-34 98-50-20	1
KEAS (FM)	Eastland	3.00	62.0	32-23-47 98-46-26	2
KEAS (AM)	Eastland	0.50	224.18	32-23-47 98-46-26	3\1
WBAP	FT. Worth	50.0	2810.82	32-36-38 97-10-00	4
KLIF	Dallas	5.0	732.25	32-56-40 96-59-25	5
KSKY	Balch Sp	10.0	930.97	32-45-02 96-41-41	6
KPBC	Garland	10.0	1021.20	33-01-58 96-34-31	7
KRLD	Dallas	50.0	2788.05	32-53-25 96-38-44	8

\1 Contour increased to 1 mV/m for map purposes

EXHIBIT D

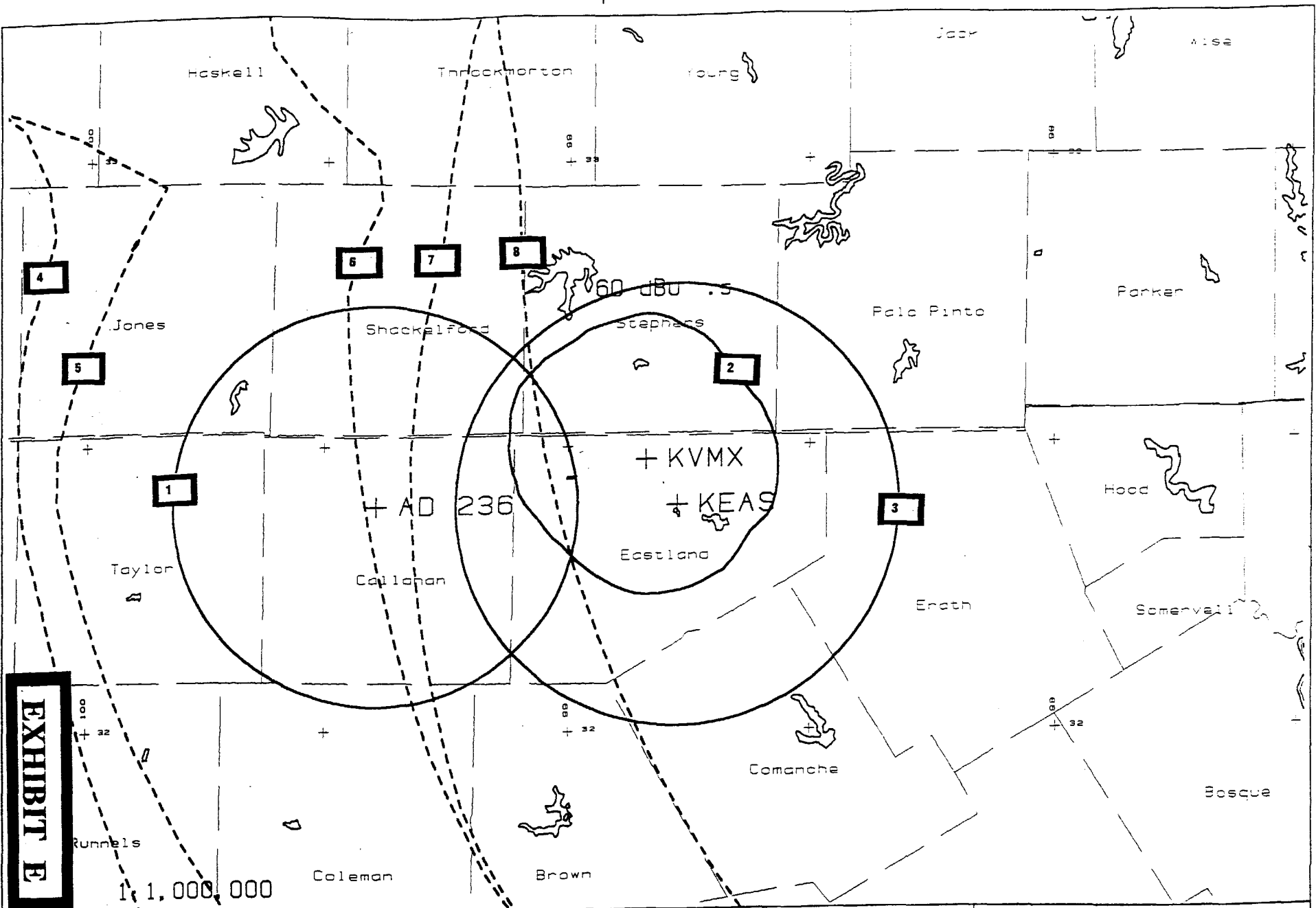


EXHIBIT E

<p>Scale in km</p> <p>0 10 20 30 40 50 60 70</p>	<p>N. Lat. 32 28 34</p> <p>W. Lng. 98 50 20</p>	<p>KVMX REMAINING SERVICE</p> <p>REYNOLDS TECHNICAL</p>
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